

OFFICE OF THE PRESIDENT

September 18, 2008



325-235-7336  
FAX: 325-235-7320  
www.tstc.edu

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Suite TW-A325  
Washington, D.C. 20554

Re: Annual 64.2009(e) CPNI Certification for 2007  
Texas State Technical College  
499 Filer ID No. 825674  
EB Docket No. 06-36

Dear Ms. Dortch:

This statement is to certify that Texas State Technical College West Texas ("TSTC") has not and does not sell any customer information to anyone or to any company. TSTC is a not for profit educational agency of the State of Texas, in part providing educational communications resources for video distribution and internet to itself and other state schools and institutions in Texas Educational Service Center Region 14. TSTC keeps all customer information and records, both paper and electronic, in a secure location and uses such information only for billing purposes and to discuss with customers service level adjustments and usage history. Access to that location, as well as the information stored there, is strictly limited to a few authorized personnel of TSTC, each of whom has been trained in the need to maintain the strictest security respecting customer proprietary information. Technical staff that manage the system are also under strict instructions not to share information regarding customers and usage patterns with third parties.

TSTC was previously unaware of an annual certification requirement applicable to it under Part 64 of the Rules pertaining to the securing of customer proprietary information. Upon recent receipt of an inquiry letter from the FCC, TSTC first learned of this obligation. Nonetheless, a review of TSTC's policies and internal practices reveals that TSTC adequately safeguarded the proprietary information of its customers and complied with the requirements of subpart U of Section 64 of the Commission's Rules for the period in question. As noted above TSTC does not use any of its customer proprietary information for marketing and does not sell such information to third parties. Additionally, TSTC's policies and practices with regard to such information restricted its availability to but a few technical and billing personnel. Over the past year, TSTC has not received any customer complaints regarding the unauthorized release or mishandling of proprietary information. Additionally, TSTC did not take any actions against data brokers between January 1, 2007, and the date of this letter.

650 E. HWY 80  
ABILENE, TX 79601  
325-672-7091

307 N. BRECKENRIDGE AVE  
BRECKENRIDGE, TX 76424  
254-559-6556

305 BOOKER ST.  
BROWNWOOD, TX 76801  
325-641-5987

300 HOMER K. TAYLOR DR.  
SWEETWATER, TEXAS 79556  
325-235-7300

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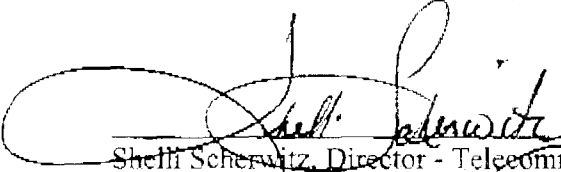
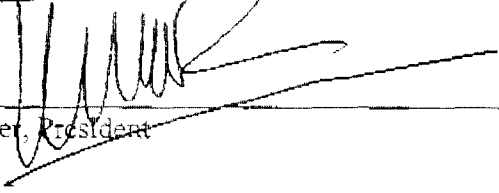
Annual 64.2009(e) CPNI Certification for 2007

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TSTC has disseminated its policy to and has trained all personnel associated with such communications services to treat such customer information and customer records as proprietary information and to not share information with any outside parties. Attached to this certificate is a copy of TSTC's policy regarding the procedures employed for the protection of customer information.

The undersigned, Shelli Scherwitz, Director of Telecommunications Services at TSTC, hereby certifies under penalty of perjury that I am the Director of Telecommunications and an officer of TSTC and responsible for the preparation of this certificate and oversight of TSTC's compliance with the CPNI rules. I further certify to the truth and accuracy of the information contained in this certificate, that I have personal knowledge of TSTC's operating procedures, and that TSTC has established operating procedures adequate to ensure compliance with the FCC's CPNI rules set forth in §§64.2001 *et seq.*

The undersigned, Michael L. Reeser is the President and an officer of TSTC, and as such has oversight over the department providing carriage services and reviews its policies and procedures, but relies on the director of that department as the person with personal knowledge regarding the implementation of such policies and procedures. I certify on behalf of TSTC and based on the statements made herein by Shelli Scherwitz, the Director of Telecommunications Services, that TSTC has established operating procedures adequate to ensure compliance with the FCC's CPNI rules set forth in §§64.2001 *et seq.*

  
\_\_\_\_\_  
Shelli Scherwitz, Director - Telecommunications Services  
\_\_\_\_\_  
Date  
\_\_\_\_\_  
Michael L. Reeser, President  
\_\_\_\_\_  
Date

Attachment

c: Enforcement Bureau, FCC  
Best Copy and Printing, Inc.

**TEXAS STATE TECHNICAL COLLEGE WEST TEXAS  
CUSTOMER INFORMATION POLICY**

**To protect the proprietary and private information about our customers, Texas State Technical College, West Texas, has established this internal policy regarding customer information:**

1. All of the TSTC's proprietary carrier data bases, including that containing customer information, are password protected, and access to same is limited to authorized personnel only. Access to TSTC's network is by password and distribution of the database password is limited to authorized personnel, and is changed periodically.
2. Employees are to closely guard customer lists, contact information, telephone numbers, mobile code lists, Email addresses and all other customer information, both proprietary and public, to prevent any information from being removed from our offices by non-employees, either accidentally or intentionally.
3. Customer information may not be removed from the TSTC offices by employees or others, except for meetings with customers themselves, in which case such information must be returned to the files immediately following such meeting. This includes computer printouts, handwritten information or notes, photocopies of files or documents or copies in any electronic form, and verbal transmission of customer information to persons who are not direct employees of the TSTC.
4. Internal documents, notes made on customer visits or when customers call in, and anything containing customer proprietary information must be promptly filed or shredded.
5. Each new customer is asked to select a personal password and security question, which password and information is to be used for identification purposes before discussing such customer's account over the phone. At the start of any phone contact with a customer, the customer must confirm his/her identity by providing his/her password or answering the security question and must authorize the TSTC employee to review his/her account information before any matter involving CPNI may be discussed with the customer. If the customer chooses to not use a password, they must verify their social security or Tax ID number and current billing address before information is given to them regarding their account.
7. Customer information is never to be used or disclosed to anyone, except as follows:
  - (a) to market the company's service offerings to customer;
  - (c) to protect the company's own rights and property, and to protect the rights of other carriers or other users of services from fraudulent, abusive or unlawful use;
  - (d) to comply with the company's obligations to provide certain customer information when lawfully requested by law enforcement authorities pursuant to the Communications Assistance for Law Enforcement Act ("CALEA"); and
  - (e) to resolve specific customer questions about the customer's own account following identification verification and prior authorization are obtained.
8. Disconnected or inactive customer files are to be retained for no more than three (3) years, and then shredded. Disconnected or inactive customer files are never to be placed in the trash unshredded. Customer database printouts are to be shredded when replaced by newer printouts.
9. Appropriate disciplinary action will be taken for any violations of this policy.